

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATIE MILILLO, IRENE JOHNSON
JANINE HELLER and TOMAYITA
STEVENSON,
Plaintiffs,

V.

ULTRASOUND DIAGNOSTIC SCHOOL:
WHITMAN EDUCATION GROUP,
CAREER EDUCATION CORP.,
and LOUIS GIANELLI,
Defendants.

DOCKET NO. 04:cv-30130-MAP

**ASSENTED TO MOTION TO EXTEND TIME TO RESPOND
TO DEFENDANTS' PARTIAL
MOTIONS TO DISMISS THE PLAINTIFFS' COMPLAINT**

The Plaintiffs respectfully move this Honorable Court for an extension of time to file their response to the Defendant Louis Gianelli's Motion to Dismiss Counts II and V of the Plaintiff's Complaint and the remaining Defendants' Motion to Dismiss Count V of the Plaintiff's Complaint. As grounds for this motion, Plaintiffs state:

1. All the Defendants have filed Motions to Dismiss certain counts of the Plaintiffs' Complaint.
2. In support of those Motions the Defendant's submitted extensive Memoranda of Law in support.
3. Due to an intervening pre-planned vacation out of the country, Plaintiffs' lead counsel just received and reviewed the Motions and Memoranda submitted by the Defendants.

4. Due to the press of other business, including several already scheduled Court appearances and other deadlines, the Plaintiffs' counsel requests twelve (12) additional days from which the last response would be due, up to and including **November 24, 2004**, to complete the Plaintiff's response.

5. ***Defendants assent to this Motion.***

Respectfully submitted,

THE PLAINTIFFS
By their attorney,

/s/ Suzanne Garrow
Suzanne Garrow BBO # 636548
Joel H. Feldman BBO # 552963
Heisler, Feldman & McCormick, P.C.
1145 Main Street, Suite 508
Springfield MA 01103
(413)788-7988
(413)788-7996 (fax)

Dated: November 3, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served by first class and electronic mail upon the attorneys of record for the Defendant on November 3, 2004.

/s/ Suzanne Garrow
Suzanne Garrow